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January 12, 2024

BY ELECTRONIC FILING

Hon. George B. Daniels
United States District Judge
United States Courthouse
500 Pearl St. New York, NY 10007

SO ORDERED

The conference currently scheduled for
January 23, 2024, is adjourned to
February 6, 2024, at 10:00 a.m.

JAN 17 2024 *George B. Daniels*

Re: U.S. v. Andres Caicedo, Cr. No. 21-021

Your Honor:

I write to respectfully request, with no objection from the government, a continuance of a pre-trial conference currently scheduled for January 23, at 10:00 am.

On December 7, 2023, this Honorable Court appointed me to represent Mr. Andres Caicedo under the Criminal Justice Act after his prior CJA attorney, Mr. Joshua Kirshner, was granted leave to withdraw. Since then, I have spoken with prior counsel and with the Assistant United States Attorneys assigned to this matter on several occasions. I have also held several conversations with my client, Mr. Caicedo.

The government recently sent me voluminous discovery, but I have not yet been able to examine it in order to have meaningful, substantive conversations with Mr. Caicedo and provide him counsel as to the criminal charges lodged against him, some of which carry mandatory minimum sentences. Additionally, on January 23, I have a calendar conflict with another case.

Because I have not yet been able to review discovery and because I have a calendar conflict on January 23, I respectfully request from this Honorable Court, with no objection from the government, that the pre-trial conference currently scheduled for January 23 be shortly continued for either January 29 or 30, or any other date thereafter which the Court's calendar can accommodate.

The additional time will afford me the opportunity to review discovery, to have conversations with Mr. Caicedo regarding that discovery, and to be in a better position to inform the Court whether there will be pre-trial motions in this case, and whether I anticipate that the case will proceed to trial or be resolved through a non-trial disposition.

Respectfully,

S/Leonardo M. Aldridge

Leonardo M. Aldridge

Cc. AUSAs Adam Marguiles and Jonathan Bodansky